

1 BOIES SCHILLER FLEXNER LLP
2 David Boies (admitted *pro hac vice*)
3 333 Main Street
4 Armonk, NY 10504
5 Tel: (914) 749-8200
6 dboies@bsflp.com
7 Mark C. Mao, CA Bar No. 236165
8 Beko Reblitz-Richardson, CA Bar No. 238027
9 Erika Nyborg-Burch, CA Bar No. 342125
10 44 Montgomery St., 41st Floor
11 San Francisco, CA 94104
12 Tel.: (415) 293-6800
13 mmao@bsflp.com
14 brichardson@bsflp.com
15 enyborg-burch@bsflp.com
16 James Lee (admitted *pro hac vice*)
17 Rossana Baeza (admitted *pro hac vice*)
100 SE 2nd St., 28th Floor
11 Miami, FL 33131
12 Tel.: (305) 539-8400
13 jlee@bsflp.com
14 rbaeza@bsflp.com
15 Alison L. Anderson, CA Bar No. 275334
16 725 S Figueroa St., 31st Floor
17 Los Angeles, CA 90017
18 Tel.: (213) 995-5720
19 alanderson@bsflp.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated.

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

SUSMAN GODFREY L.L.P.
William C. Carmody (admitted *pro hac vice*)
Shawn J. Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
Alexander Frawley (admitted *pro hac vice*)
1301 Avenue of the Americas, 32nd Floor
New York, NY 10019
Tel.: (212) 336-8330
bcarmody@susmangodfrey.com
srabin@susmangodfrey.com
sshepard@susmangodfrey.com
afrawley@susmangodfrey.com

Amanda K. Bonn, CA Bar No. 270891
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: (310) 789-3100
abonn@susmangodfrey.com

MORGAN & MORGAN
John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
jyanchunis@forthepeople.com
rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
711 Van Ness Ave, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARK C. MAO IN
SUPPORT OF PLAINTIFFS' REPLY RE:
SUPPLEMENTAL SANCTIONS**

Referral: The Honorable Susan van Keulen

DECLARATION OF MARK C. MAO

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify

2. I submit this Declaration in support of Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief Pursuant to Dkt. 624.

3. Attached hereto as **Exhibit B**¹ is a true and correct copy of a document Google produced in discovery labeled GOOG-BRWN-00857642.

4. Attached hereto as **Exhibit C** is a true and correct copy of a document Google produced in discovery labeled GOOG-CABR-00546609.

5. Attached hereto as **Exhibit D** is a true and correct copy of a document Google produced in discovery labeled GOOG-CABR-04087254.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 25th day of August, 2022, at San Francisco, California.

/s/ *Mark C. Mao*

¹ For the Court's ease of reference, Plaintiffs continue the serial labeling of exhibits from their opening brief.